

LAW OFFICE OF TODD D. LERAS
Todd D. Leras, CA SBN 145666
455 Capitol Mall, Suite 802
Sacramento, California 95814
(916) 504-3933
toddleras@gmail.com
Attorney for Defendant
DAVID HANSEN

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,

vs.

DAVID KENNETH HANSEN,
Defendant.

Case No.: 2:20-cr-021 DJC

STIPULATION AND ORDER SETTING
STATUS CONFERENCE AND
EXCLUDING TIME UNDER THE SPEEDY
TRIAL ACT

Plaintiff United States of America by and through Assistant United States Attorney James
Conolly, and Attorney Todd Leras on behalf of Defendant David Hansen, stipulate as follows:

1. This matter was previously set for a status conference before United States District
Court Judge Troy L. Nunley on May 18, 2023.
2. On April 3, 2023, Chief United States District Judge Kimberly J. Mueller issued an
“Order Reassigning Case” (the “Reassignment Order”). The Reassignment Order
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1 transferred the case to this Court and vacated all currently set dates. The
2 Reassignment Order further directed the parties to consult the Court's calendar and
3 set the matter for a hearing before the reassigned judge. The parties request to set the
4 matter for a status conference/potential change of plea hearing on July 6, 2023, at
5 9:00 a.m.
6

- 7 3. This case involves drug trafficking and firearm charges stemming from execution of
8 search warrants in Sacramento and Placer Counties.
- 9 4. The government produced supplemental discovery materials in July 2022, including
10 hundreds of hours of video recordings, downloaded onto an external hard drive
11 provided by defense counsel. These video recordings are so voluminous that they
12 required computer storage space of approximately two terabytes. These recordings
13 also contain information regarding information requiring additional investigation
14 related to potential defenses and sentencing mitigation.
15
- 16 5. Defendant David Hansen is in pre-trial custody at the Wayne Brown Correctional
17 Facility (WBCF) in Nevada City, California. WBCF is located approximately 65-
18 miles from defense counsel's office in downtown Sacramento. Defense counsel is
19 required to travel for all client meetings to review the supplemental discovery
20 recordings and any defense investigation materials resulting from them. Defendant
21 requests additional time to complete its investigation.
22
- 23 6. Given the ongoing defense investigation and Mr. Hansen's pre-trial housing location,
24 the defense requests to exclude time between May 18, 2023, and July 6, 2023,
25 inclusive, under Local Code T-4. The United States does not oppose this request.
26
27

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- 1 7. Attorney Todd Leras represents and believes that failure to grant additional time as
2 requested would deny Defendant Hansen the reasonable time necessary for effective
3 preparation, considering the exercise of due diligence.
4
- 5 8. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, *et*
6 *seq.*, within which trial must commence, the time period of May 18, 2023 to July 6,
7 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), and (B)
8 (iv) [Local Code T-4] because it results from a continuance granted by the Court at
9 Defendant Hansen's request on the basis that the ends of justice served by taking such
10 action outweigh the best interest of the public and the Defendant in a speedy trial.
11
- 12 9. Nothing in this stipulation and order shall preclude a finding that other provisions of
13 the Speedy Trial Act dictate that additional time periods are excludable from the
14 period within which a trial must commence.

15 Assistant U.S. Attorney James Conolly has reviewed this proposed order and authorized
16 Todd Leras via email to sign it on his behalf.
17

18 DATED: June 22, 2023

PHILLIP A. TALBERT
United States Attorney

19
20 By /s/ Todd D. Leras for
JAMES CONOLLY
Assistant United States Attorney
21

22 DATED: June 22, 2023

23 By /s/ Todd D. Leras
TODD D. LERAS
Attorney for Defendant
DAVID HANSEN
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ORDER

BASED ON THE REPRESENTATIONS AND STIPULATION OF THE PARTIES, it is hereby ordered that a status conference/potential change of plea hearing is scheduled for July 6, 2023, at 9:00 a.m. The Court further finds, based on the representations of the parties and Defendant Hansen's request, that the ends of justice served by granting the continuance outweigh the best interests of the public and the Defendant in a speedy trial. Time shall be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(B)(iv) and Local Code T-4, to allow necessary attorney preparation taking into consideration the exercise of due diligence for the period from May 18, 2023, up to and including July 6, 2023.

IT IS SO ORDERED.

Dated: June 26, 2023

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE

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